

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SUSAN COONEY,

Plaintiff,

COPY

vs.

Docket No. 0411572 JLT

SAYBROOK GRADUATE SCHOOL and
RESEARCH CENTER, and MAUREEN
O'HARA, Individually,

Defendants.

Deposition of

ALAN G. VAUGHAN, Ph.D.

MARCH 16, 2006

NOTICING ATTORNEY, PAUL W. MORENBERG, ESQ.

REPORTED BY: JEANINE FARRELL, CSR NO. 7774

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1 (The record was read back as follows:

2 Q. "Did Dr. Bohart or Dr. Clark advise
3 you that Saybrook had documents regarding
4 licensing standards in any jurisdictions?")

5 THE WITNESS: They did not advise me of any
6 documents that they had regarding licensing
7 standards.

8 MR. MORENBERG: Q. Did they advise you of
9 any resources they could provide to help you in your
10 project?

11 A. They provided a laptop computer for me to do
12 online search.

13 Q. Did they share with you any documents that
14 Saybrook possessed from the consortium for
15 diversified psychology programs?

16 MS. GARCIA: Objection.

17 THE WITNESS: I did see some documents from
18 the consortium.

19 MR. MORENBERG: Q. And can you tell me
20 which documents you saw?

21 A. I can not, no, sorry.

22 Q. Can you tell me the years in which those --
23 strike that.

24 If it's okay with you, Dr. Vaughan, I am
25 going to ask questions where I use the acronym CDPP;

1 is that okay?

2 A. Okay.

3 Q. Do you recall the year or years of the CDPF
4 publications that you reviewed?

5 A. No, I don't recall.

6 MR. MORENBERG: Can you show the witness
7 Exhibit 17.

8 MS. GARCIA: No, I don't have Exhibit 17.

9 MR. MORENBERG: Sorry.

10 MR. VARTAIN: Would that be 17 from
11 Plaintiffs?

12 MR. MORENBERG: Yes.

13 Q. Dr. Vaughan, is this one of the documents
14 that you received?

15 A. I don't recognize it. I don't recall that
16 -- I do recall the name Rudy Melone.

17 Q. Do you recall receiving any documents that
18 were authored by Rudy Melone?

19 MR. VARTAIN: Objection.

20 MR. MORENBERG: Q. You may answer.

21 A. Yeah, I do recall receiving some documents
22 that were related to the consortium, but I threw
23 those documents away.

24 Q. Why did you throw those documents away,
25 Doctor?

1 A. Because I had them for three years and they
2 just -- I wasn't really using them. There weren't
3 many. Just a few documents that I sorted through in
4 doing some research on setting up this licensing
5 information bulletin and they were just old documents
6 that were in a box.

7 Q. Did you receive the documents from
8 Maureen O'Hara?

9 A. No.

10 Q. Who at Saybrook provided the documents to
11 you?

12 MS. GARCIA: Objection.

13 MR. MORENBERG: Q. You may answer.

14 A. I just looked through some files and just
15 took what documents I thought might be relevant to
16 the research involved in setting up a licensing
17 information bulletin.

18 Q. And were any of those documents authored or
19 co-authored by Rudy Melone?

20 MS. GARCIA: Objection.

21 THE WITNESS: I think I recall Rudy Melone's
22 name being mentioned in the documents. And that's
23 how I learned about this consortium of diversified
24 psychology programs.

25 MR. VARTAIN: When you have a chance,

1 Counsel, I would like to take a brief five minute
2 break.

3 MR. MORENBERG: When did we start this
4 deposition?

5 THE REPORTER: We started at 3:05.

6 MS. GARCIA: We have been going all day,
7 Counsel.

8 MR. MORENBERG: That's true but you had a
9 break or at least Attorney Vartain and I had a break.
10 We can break in about five minutes.

11 If you could show the witness Exhibit 37 to
12 Dr. O'Hara's deposition.

13 Q. Could you tell me if you have ever reviewed
14 that particular document and you can take a minute to
15 flip through it if you need to.

16 A. No, I don't recall reviewing this document.

17 Q. I would like to turn your attention to page
18 four of the document.

19 A. There are actually no page numbers.

20 Q. Fourth page of the document.

21 MS. GARCIA: Is that the Bates Stamp 1982.

22 MR. MORENBERG: Yes, it is.

23 Q. I would like to ask you if any of the other
24 CDDP documents included an analysis of various
25 jurisdictions similar to the format of this document?

1 MS. GARCIA: Objection.

2 MR. MORENBERG: Q. You may answer.

3 A. Not to my recollection.

4 Q. Do you recall the information that was
5 contained in the documents that you threw away?

6 A. I can't say that I do, no. I think just a
7 general statement of the consortium, like the
8 membership of the consortium. There weren't massive
9 documents. There might have been one or two
10 documents.

11 Q. Do you know if any of the documents covered
12 the period of 1996 -- strike that.

13 Do you know if any of the documents were
14 dated or produced between February 1996 and 2002?

15 MS. GARCIA: Objection.

16 THE WITNESS: I don't recall.

17 MR. MORENBERG: If you could show the
18 witness Exhibit 47.

19 Q. Dr. Vaughan, have you ever seen this
20 document before today?

21 A. Not to my knowledge, no.

22 Q. Have you received any documents from Tom
23 Greening concerning licensing standards?

24 A. Not that I recall.

25 Q. Did you receive any documents from Marsha